

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

BRIAN FLORES, STEVE WILKS and RAY  
HORTON, as Class Representatives, on  
behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

THE NATIONAL FOOTBALL LEAGUE;  
NEW YORK FOOTBALL GIANTS, INC.  
d/b/a NEW YORK GIANTS; MIAMI  
DOLPHINS, LTD. d/b/a MIAMI  
DOLPHINS; DENVER BRONCOS  
FOOTBALL CLUB d/b/a DENVER  
BRONCOS; HOUSTON NFL HOLDINGS,  
L.P. d/b/a HOUSTON TEXANS; ARIZONA  
CARDINALS FOOTBALL CLUB LLC d/b/a  
ARIZONA CARDINALS; TENNESSEE  
TITANS ENTERTAINMENT, INC. d/b/a  
TENNESSEE TITANS and JOHN DOE  
TEAMS 1 through 26,

Defendants.

Civil Action No.: 22-CV-00871 (VEC)

**NOTICE OF DEFENDANTS' MOTION TO  
COMPEL ARBITRATION AND STAY FURTHER PROCEEDINGS**

PLEASE TAKE NOTICE that, pursuant to Sections 3 and 4 of the Federal Arbitration Act, 9 U.S.C. §§ 3–4, Defendants respectfully move this Court for an order compelling the arbitration of Plaintiffs' claims and staying further proceedings in this action. Filed contemporaneously with this notice is a memorandum of law in support of Defendants' motion and the accompanying declaration of Dolores F. DiBella. Defendants submit this motion in accordance with the Court's scheduling order of May 2, 2022 (ECF

No. 43) and without waiver of any other defenses to this action, including objections to the propriety of venue in this District or the Court's personal jurisdiction. *See, e.g., Ramasamy v. Essar Glob. Ltd.*, 825 F. Supp. 2d 466, 467 n.1 (S.D.N.Y. 2011); *see also Halliburton Energy Servs., Inc. v. Ironshore Specialty Ins. Co.*, 921 F.3d 522, 529 n.2 (5th Cir. 2019); *Gerber v. Riordan*, 649 F.3d 514, 519 (6th Cir. 2011).

Dated: New York, New York  
June 21, 2022

**PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP**

By: /s/ Loretta E. Lynch  
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